

1. Plaintiff filed the Complaint with this Court on June 27, 2023. (Doc. 1).
2. HRRG was served with the Complaint on July 3, 2023.
3. Absent an extension, HRRG's deadline to answer or otherwise respond to the Complaint is currently July 24, 2023.
4. This request is not made for the purpose of delay or harassment, and no party will be prejudiced by the additional time for HRRG to answer or otherwise respond.

5. The parties are and have been engaged in communications regarding the allegations in the Complaint, are conducting an investigation into the underlying facts, in order for the parties' good faith settlement negotiations to continue, or failing that to allow HRRG time to respond.

6. In a telephone conference on July 18, 2023, HRRG requested and Plaintiff's counsel agreed that HRRG may have up to and including September 7, 2023, to file its Answer or otherwise respond to Plaintiff's Complaint.

Respectfully submitted this 24th day of July, 2023.

Respectfully submitted,

**KAUFMAN DOLOWICH & VOLUCK LLP**

/s/Avery Dial

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**Rule 7.1(a)(3) CERTIFICATION**

Pursuant to Local Rule 7.1(a)(3), Defendant's counsel conferred with Plaintiff's counsel regarding the extension of time for it to answer or otherwise respond to the Complaint. Plaintiff's counsel consented to the requested extension of time.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 24<sup>th</sup> day of July, 2023, a true and correct copy of the foregoing was filed with the Clerk of the Court using the CM/ECF system which will send notice of electronic filing to all parties or in some other authorized manner for those counsel or parties who are not authorized to receive notices electronically.

Respectfully submitted,

By: /s/Avery Dial  
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